

Plan for Coordination with U.S. Navy on Development of Plan for RE-108 Hot Spot

Operable Unit 2, Northrop Grumman-Bethpage Facility Site
Bethpage, New York

Prepared for:

NORTHROP GRUMMAN

The Northrop Grumman logo features the company name in a bold, italicized, sans-serif font. Below the text is a horizontal line that starts with a small upward curve on the left and then continues straight to the right.

June 30, 2015

Prepared by:



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1. Introduction

This plan for coordination with the U.S. Navy (Navy) is being submitted by EMAGIN, on behalf of Northrop Grumman Systems Corporation (Northrop Grumman), in accordance with the Administrative Order on Consent for Operable Unit 2 (OU2 Consent Order, effective on May 1, 2015). Northrop Grumman agreed under the OU2 Consent Order to work cooperatively with the Navy in the development of a plan to address the elevated levels of contamination in groundwater identified in the vicinity of VPB-139 and VPB-142 (currently referred to as the RE-108 hot spot). Further, pursuant to Paragraph II.B(c) of the OU2 Consent Order, Northrop Grumman agreed to submit a plan for working with the Navy in developing the hot spot work plan within 60 days after the effective date of the Consent Order (i.e., by June 30, 2015).

2. Background

On October 22, 2014, the Navy informed the New York State Department of Environmental Conservation (DEC) of the analytical results obtained during the March through September 2014 period from monitoring wells installed in an area upgradient of Bethpage Water District Plant 6. In a November 5, 2014 follow-up letter, DEC notified the Navy that the reported sampling results exceeded the 1 ppm "hot spot" criterion established in the 2001 OU2 Record of Decision (ROD) and, therefore, remediation of the hot spot was required on an expedited basis. Further, the letter required the Navy to provide a work plan, within 60 days, for design and installation of a groundwater collection and treatment system to contain the hotspot and to participate in monthly conference calls with DEC to discuss progress in developing and implementing the work plan. The Navy responded to DEC in a March 17, 2015 letter, which included a plan titled "USN Strategic Work Plan, Operable Unit No. 2 Groundwater" for addressing the hot spot. Northrop Grumman is unaware if DEC has accepted or requested modifications to the submitted work plan or is requesting submittal of further documents.

On November 21, 2014, DEC notified Northrop Grumman of the Navy's hot spot findings and that the DEC expected Northrop Grumman to participate in the Navy's hot spot remedial efforts. Further, DEC stated that it expected Northrop Grumman to enter into a Consent Order for implementation of the OU2 ROD. DEC and Northrop Grumman subsequently negotiated the OU2 Consent Order, with one of the conditions being submittal of a plan for working cooperatively with the Navy in its development of a plan for the RE-108 hot spot. On December 5, 2014, Northrop

Grumman responded to DEC's November 2014 letter, indicating:

- Northrop Grumman had contacted the Navy to offer its cooperation in development of a plan to address the hot spot;
- The Navy had informed Northrop Grumman that it was in the process of developing the DEC-requested work plan; and
- The Navy had stated its intent to move ahead with the plan without Northrop Grumman's input and that such discussions should be folded into the ongoing mediation between Northrop Grumman and the Navy.

3. Coordination Plan

The Navy indicated in its March 17, 2015 letter to DEC that it expected Northrop Grumman to participate in the RE-108 hot spot remedial activities. Northrop Grumman is prepared to conduct the following activities to work cooperatively with the Navy in development of the hot spot work plan, as appropriate:

- Northrop Grumman will participate in one or more working sessions with the Navy to develop the content of the hot spot work plan, including providing supporting data and information. If requested, Northrop Grumman may draft portions of the work plan.
- Northrop Grumman will review and provide written and/or verbal comments to the Navy on drafts of the hot spot work plan.
- Comments will be provided through technical meetings, phone calls, or through exchange of emailed documents.
- Northrop Grumman will participate in monthly status updates called for in DEC's November 2014 letter.

4. Project Contacts

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